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Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.622(b),
Table of Allotments,
Digital Television Broadcast Stations.
(Macon, Georgia)

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MM Docket No. 01-1 /
RM-10013

To: Chief, Video Services Division

COMMENTS AND COUNTERPROPOSAL

Macon Urban Ministries, Inc., d/b/a Good News Television, licensee of NTSC television broadcast station WGNM, Channel 64, Macon, Georgia, through counsel and pursuant to Section 1.420 of the Rules, hereby submits these Comments and a counterproposal in response to the FCC's *Notice of Proposed Rule Making*, DA No. 01-001, released January 5, 2001 (the "*NPRM*"). At the request of Gannett Georgia, L.P. ("Gannett"), licensee of station WMAZ-TV, NTSC channel 13, Macon, the FCC proposes, in the *NPRM*, to substitute Channel 4 for WMAZ-TV's assigned DTV channel, Channel 45, in the Table of Digital TV Allotments at Macon, Georgia. Channel 45 would be deleted from the table. The proposed changes in the DTV Table of Allotments may be summarized as follows:

	<u>Channel No.</u>	
<u>City</u> _____	<u>Present</u>	<u>Proposed</u>
Macon, Georgia	16, 40, 45, 50	4, 16, 40, 50

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List A B C D E

The paired DTV allotment for WGNM(TV) is Channel 50. Good News Television has a pending application (File No. BPCDT-19991029AFL) for a construction permit to operate directionally on Channel 50 with 1,000 kW effective radiated power at 208 meters above average terrain. As set forth in the attached engineering statement of Good News Television's consulting engineers, du Treil, Lundin & Rackley, Inc., the Channel 50 antenna must be directionalized to avoid excessive interference to NTSC Channel 50 at Opelika, Alabama, and minimize interference to DTV stations on Channel 50 at Bainbridge, Georgia, and Birmingham, Alabama, and Channel 51 at Cordele, Georgia.

Gannett's current Channel 45 allotment permits *non-directional* operation at 1,000 kW at 238 meters above average terrain. Good News Television, therefore, urges that the FCC not eliminate Channel 45 from the table, as proposed in the *NPRM*, but instead change WGNM(TV)'s paired DTV allotment from Channel 50 to Channel 45.¹ Operating non-directionally on Channel 45 from the transmitter site proposed in Good News Television's pending application (32° 45' 51" N, 83° 33' 32" W) with 1,000 kW ERP at 223 meters AAT, WGNM-DT would provide service to a total of 623,817 persons (1990 Census), including all of the population within its currently authorized (File No. BPCT-980630KE) NTSC Grade B contour, and all 548,758 persons residing within the service area proposed in the pending DTV construction permit application. This would be a service gain of 75,159 persons, or 13.7 percent. Also, assignment of Channel 45 to Good News Television would eliminate potential interference to one NTSC station and three DTV stations, resulting in a more

¹ This proposal is mutually exclusive with the proposal set forth in the *NPRM* (and, therefore, a proper counterproposal) inasmuch as it proposes the modification of WGNM's paired DTV channel assignment to Channel 45 and deletion of Channel 50 from the table rather than Channel 45.

efficient utilization of the spectrum. In addition to these public interest benefits, the ability to operate nondirectionally would reduce Good News Television's costs for converting to DTV and conserve resources for other aspects of the transition, including programming.

For the foregoing reasons, the FCC should grant this counterproposal and amend the Table of DTV allotments to provide as follows:

<u>City</u> _____	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Macon, Georgia	16, 40, 45, 50	4, 16, 40, 45 ²

Respectfully submitted,

MACON URBAN MINISTRIES, INC., d/b/a
GOOD NEWS TELEVISION

By


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² Specifically, the Channel 45 allotment should provide for operation with 1,000 kW maximum ERP at 223 meters AAT.

ENGINEERING STATEMENT
COUNTERPROPOSAL IN RULE MAKING
GOOD NEWS TELEVISION
MACON, GEORGIA

This engineering statement was prepared on behalf of Good News Television, licensee of television station WGNM Macon, Georgia. Station WGNM operates on analog channel 64 and has been allotted channel 50 for DTV use. There is an application pending with the FCC for use of DTV channel 50, employing maximum effective radiated power of 1,000 kilowatts with antenna height above average terrain of 208 meters, File No. ARN-19991029AFL.

In MM Docket No. 01-01 (RM-10013), Gannett Georgia, L.P., licensee of station WMAZ-TV Macon, Georgia requested substitution of DTV channel 4 for the assigned DTV channel 45. The WMAZ-TV proposal to amend the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules is summarized following:

<u>City</u>	<u>Channel Number</u>	
	<u>Present</u>	<u>Proposed</u>
Macon, Georgia	16, 40, 45, 50	4, 16, 40, 50

Good News Television supports the Gannett rule making, but proposes further modification of the DTV Table

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of Allotments by substitution of DTV channel 45 for DTV channel 50, with assignment of channel 45 to WGNM. The revised DTV Table of Allotments would read:

<u>City</u>	<u>Channel Number</u>	
	<u>Present</u>	<u>Proposed</u>
Macon, Georgia	16, 40, 45, 50	4, 16, 40, 45

Currently, DTV channel 45 is assigned to WMAZ-TV with effective radiated power (ERP) of 1,000 kilowatts and with antenna height above average terrain (HAAT) of 238 meters. WMAZ-TV holds a construction permit for use of DTV channel 45, employing ERP of 1,000 kilowatts with HAAT of 238 meters. The transmitter site of WGNM is located 1.3 kilometers north of the WMAZ-TV, therefore any allocation concerns with use of channel 45 would be essentially the same at the WMAZ-TV or WGNM site.

The WGNM application for DTV channel 50, employing ERP of 1,000 kilowatts with (HAAT) of 208 meters proposes use of a directional antenna so as to avoid excessive interference to NTSC channel 50 at Opelika, AL. In addition, there are DTV interference concerns with WTLH-DT Bainbridge, GA (channel 50), WBRC-DT Birmingham, AL (channel 50) and WSST-DT Cordele, GA (channel 51). The reassignment of WGNM to DTV channel 45 will eliminate the possibility of interference to these stations, while permitting potential expansion of the facilities of these

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DTV channel 50 and 51 stations, as soon as the channel 50 allotment at Macon vacated.

The following parameters would apply to the assignment of DTV channel 45 to WGNM:

Transmitter Location	32-45-51 North Latitude 83-33-32 West Longitude
ERP	1,000 KW
HAAT	223 Meters
Antenna	Omni-directional

With use of the proposed facility, and as shown on the attached map, Figure 1, WGNM would provide DTV service to a noise-limited area consisting of 23,116 square kilometers in which 623,917 persons reside. All of Macon, Georgia would be within the DTV principal community contour. In addition, the proposed DTV operation would provide DTV service to all of the current WGNM analog service area. Population figures are from the 1990 census.

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DTV channel 45 is superior to channel 50 for DTV use by WGNM as potential interference to other stations will be lessened and a broader area of coverage can be achieved by WGNM with use of an omni-directional antenna.

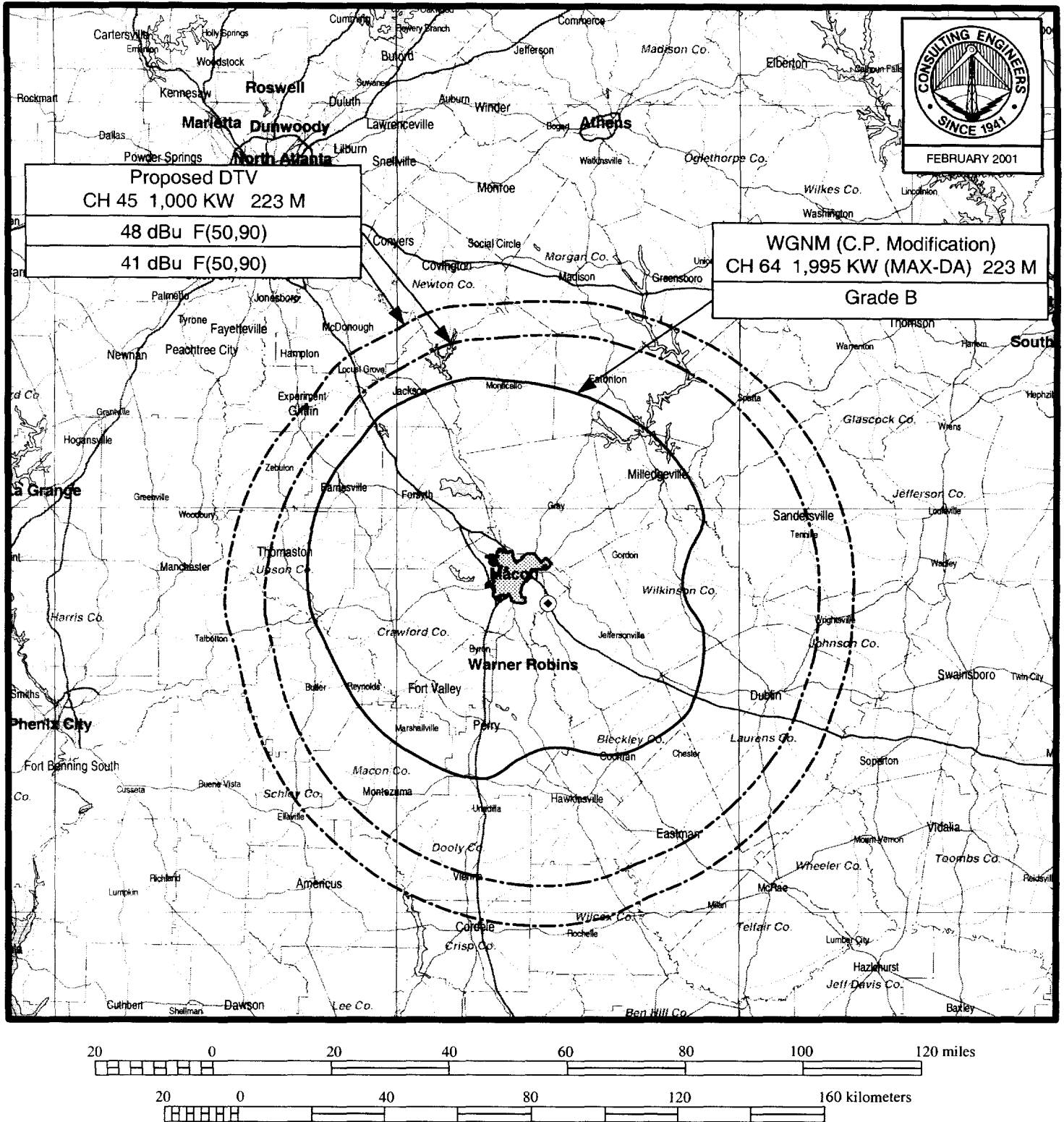


Louis R. du Treil, Sr.
du Treil, Lundin & Rackley, Inc.
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February 15, 2001

Figure 1



PREDICTED COVERAGE CONTOURS

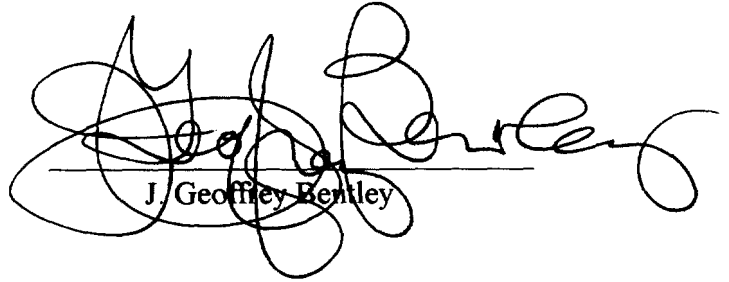
**GOOD NEWS TELEVISION
MACON, GEORGIA**

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing Comments and Counterproposal to be served by first-class United States mail, postage prepaid, this 26th day of February 2001, on:

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J. Geoffrey Bentley